

1 KEKER & VAN NEST, LLP
RACHAEL E. MENY - #178514
2 JO W. GOLUB - #246224
710 Sansome Street
3 San Francisco, CA 94111-1704
Telephone: (415) 391-5400
4 Facsimile: (415) 397-7188

5 Attorneys for Defendant
FLAGSTAR BANK, FSB
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
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11 HECTOR HERNANDEZ, an individual,
12 Plaintiff,

13 v.

14 MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.;
15 FLAGSTAR BANK, FSB; PRIME SHARE
MORTGAGE, INC.; DOE INDIVIDUALS 1
16 through 10; and ROE CORPORATIONS
AND ORGANIZATIONS 1 through 10,
17 inclusive,

18 Defendants.
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Case No. C 09-01885 MHP

**JOINT STIPULATION TO EXTEND THE
TIME IN WHICH TO RESPOND TO THE
COMPLAINT**

Date: N/A
Time: N/A
Judge: The Hon. Marilyn H. Patel
Ctmm.: 15

Date Comp. Filed: December 3, 2008

1 Plaintiff Hector Hernandez ("Hernandez") and defendant Flagstar Bank, FSB
2 ("Flagstar"), by and through their respective counsel of record, hereby declare and stipulate as
3 follows:

4 WHEREAS, on December 3, 2008, Hernandez filed a complaint in the Superior Court of
5 the State of California for the County of Alameda, captioned *Hernandez v. Mortgage Electronic*
6 *Registration Systems, Inc.*, civil action number RG08423318;

7 WHEREAS, on March 31, 2009, Flagstar accepted service of the summons and
8 complaint in the state court action;

9 WHEREAS, on April 30, 2009, Flagstar removed the action to this Court;

10 WHEREAS, the current deadline for filing Flagstar's response to Hernandez' complaint
11 is set for May 7, 2009;

12 WHEREAS, pursuant to Civil Local Rule 6-1(a), Hernandez and Flagstar agree to extend
13 the time within which to answer or otherwise respond to the complaint; and

14 WHEREAS, this Court's Order Setting Initial Case Management Conference and ADR
15 Deadlines states that motions to dismiss shall not be filed before the initial case management
16 conference, which has been set in this matter for August 10, 2009;

17 **ACCORDINGLY, THE PARTIES STIPULATE AS FOLLOWS:**

18 Defendant Flagstar shall have until August 17, 2009, to answer or otherwise respond to

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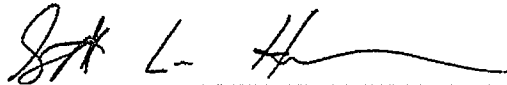
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1 plaintiff's complaint.


2 **IT IS SO STIPULATED.**

3 Dated: May 4, 2009

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5 By: 
6 SETH L. HANSON
7 Attorneys for Plaintiff
8 HECTOR HERNANDEZ

9 Dated: May 4, 2009

10 KEKER & VAN NEST LLP

11 By: 
12 RACHAEL E. MENY
13 JO W. GOLUB
14 Attorneys for Defendant
15 FLAGSTAR BANK, FSB

